

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION

MDL No. 3:16-md-02738-MAS-RLS

**NOTICE OF OBJECTIONS TO THE SPECIAL MASTER'S ORDER  
DENYING DEFENDANTS' MOTION TO COMPEL INSPECTION OF DR.  
WILLIAM LONGO'S LABORATORY**

**PLEASE TAKE NOTICE** that on August 5, 2024, the undersigned counsel will bring Defendants Johnson & Johnson and LLT Management, LLC (“Defendants”)’s Objections to the Special Master’s Order Denying Defendants’ Motion to Compel an Inspection of Dr. William Longo’s Laboratory (ECF 32826) before this Court. Defendants will ask for entry of an order vacating the Special Master’s June 17, 2024, Order (ECF 32826) denying Defendants’ Motion to Compel, and ordering Plaintiffs to make the following available for inspection:

1. All PLM microscopes used by MAS at 3945 Lakefield Ct, Suwanee, GA 30024 for its analysis of the materials referenced in Defendants’ Requests for Production 20-24 (attached hereto as Exhibit M at 10-12);
2. MAS’s methodology for preparing the materials referenced in Defendants’ requests for production 20-24 (Ex. M at 10-12) for subsequent analysis by PLM for the identification of “chrysotile,” including but not limited to observing in real time the preparation of one or more samples of Johnsons Baby Powder performed by MAS; and

3. MAS's methodology for analyzing the materials referenced in Defendants' Requests for Production 20-24 (Ex. M at 10-12) for analysis by PLM for the identification of "chrysotile," including but not limited to observing in real time the analyses performed by MAS on the samples of Johnsons Baby Powder, as well as Defendants' experts undertaking real time, contemporaneous observation of the samples on the same PLM equipment used by MAS in which MAS has previously reported, and may during the inspection report, observing "chrysotile."

**PLEASE TAKE FURTHER NOTICE** that in support of their motion, Defendants shall rely upon the Brief submitted herewith, the Declaration of Matthew Bush, Esq., together with exhibits, and any reply submissions made hereafter; and

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted herewith; and

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

Dated: July 1, 2024

Respectfully submitted,

/s/ Kristen R. Fournier  
Kristen R. Fournier

**KING & SPALDING LLP**  
1185 Avenue of the Americas  
34th Floor  
New York, NY 10036  
(212) 556-2100  
kfournier@kslaw.com

Susan M. Sharko  
**FAEGRE DRINKER BIDDLE &  
REATH LLP**

600 Campus Drive  
Florham Park, NJ 07932  
(973) 549-7350  
[susan.sharko@faegredrinker.com](mailto:susan.sharko@faegredrinker.com)

*Attorneys for Defendants Johnson & Johnson and LLT Management, LLC*